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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HOTEL EMPLOYEES & RESTAURANT
EMPLOYEES WELFARE FUND; BILL
BACIGALUPI, in his official capacity as
Trustee; JAMES DU PONT, in his official
capacity as Trustee; LIAN ALAN, in his
official capacity as Trustee; MARK
CLEMENT, in his official capacity as
Trustee; DOUGLAS CORNFORD, in his
official capacity as Trustee; THERESA
ERWIN, in her official capacity as Trustee;
WEI-LING HUBER, in her official
capacity as Trustee; and IVANA
KRJCINOVIC, in her official capacity as
Trustee;

Plaintiffs,

v.

OAKLAND RENAISSANCE
ASSOCIATES; OAKLAND GARDEN
HOTEL, LLC; INTERNATIONAL
HOTELIER MANAGEMENT CORP.;
INTERNATIONAL HOTELIER
HOLDING CORP.; INTERNATIONAL
HOTELIER, LTD.; C&L FINANCIAL,
INC.; and LAWRENCE M. CHAN;

Case No: C 09-03041 SI

**STIPULATION AND [PROPOSED]
ORDER ALLOWING THE FILING OF A
FIRST AMENDED COMPLAINT**

Plaintiffs in the above-captioned lawsuit and Defendant C&L Financial, Inc., the only
defendant which has appeared in the action, by and through their respective counsel, do hereby

1 stipulate to the filing of the First Amended Complaint attached as Exhibit A hereto.

2 DATED: 10/29/09

LEONARD CARDER, LLP

3
4 By: _____/s/_____
Christine S. Hwang
5 Attorneys for PLAINTIFFS

6
7 DATED: 10/29/09

GORDON & REES, LLP

8
9 By: _____/s/_____
Amy Maclear
10 Attorneys for Defendant:
C&L Financial, Inc.

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12 Pursuant to stipulation, Plaintiffs shall be allowed to file the First Amended Complaint
13 attached as Exhibit A hereto, and the Clerk is directed to file said First Amended Complaint.
14

15 DATED: _____

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18 Hon. Susan Illston
United States District Court Judge